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2 Pleasanton, CA 94588  
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3 Attorney for Deponents  
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8-7-92  
*[Handwritten signature]*

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

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CHURCH OF SCIENTOLOGY )  
INTERNATIONAL, a California )  
not-for-profit religious )  
corporation, )  
Plaintiff, )  
vs. )  
GERALD ARMSTRONG and DOES )  
1 through 25, inclusive, )  
Defendants. )

Case No. BC 052395  
OBJECTIONS TO DEPOSITIONS  
OF VICKI AZNARAN AND  
RICHARD AZNARAN

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ALL PARTIES AND THEIR COUNSEL OF RECORD TAKE NOTE:  
Deponents Vicki Aznaran and Richard Aznaran hereby  
object to their depositions, scheduled for August 11, 1992, and  
August 12, 1992 respectively, for the following reasons:  
1) The deposition subpoenas were served on  
deponents less than 10 days before the scheduled depositions,  
contrary to the requirements of California Code of Civil  
Procedure section 2025(f).  
2) California Code of Civil Procedure section 2031  
does not provide authority for requiring deponents to produce


1 documents at the deposition.

2 3) The documents described in Exhibit A to  
3 plaintiff's Notice of Deposition are protected by one or more  
4 of the following privileges: attorney-client privilege; work-  
5 product privilege; right to privacy.

6 4) Despite knowing that these deponents are  
7 represented by the undersigned counsel in the case of Aznaran  
8 v. Church of Scientology of California, et al., Case No. CV-88-  
9 1786-JMI(Ex), United States District Court, Central District of  
10 California, plaintiff Church of Scientology failed to notify  
11 deponents' counsel of these depositions.

12 For the foregoing reasons, Vicki and Richard Aznaran  
13 will not attend the depositions scheduled for August 11 and 12,  
14 1992.

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16 DATED: August 6, 1992

  
JOHN CLIFTON ELSTEAD  
Attorney for Deponents  
Vicki Aznaran and Richard Aznaran

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PROOF OF SERVICE BY OVERNIGHT AND REGULAR MAIL

I am a citizen of the United States; my business address is 4900 Hopyard Road, Suite 240, Pleasanton, California, 94588; I am employed in the County of Alameda where this mailing occurs; I am over the age of eighteen (18) years and not a party to the within cause. I served the within

**OBJECTIONS TO DEPOSITIONS OF VICKI AZNARAN AND RICHARD AZNARAN**

on the following person(s) on the date set forth below, by placing a true copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Post Office mail box at Pleasanton, California addressed as follows:

By overnight mail:

Laurie J. Bartilson  
Bowles & Moxon  
6255 Sunset Blvd., Suite 2000  
Hollywood, California 90028

STANLEY, HARRIS, RICE & ASSOCIATES  
3100 McKinnon, Suite 1000  
Dallas, Texas 75201

Paul Morantz  
P.O. Box 511  
Pacific Palisades, CA 90272


By regular mail:

Ford Greene  
HUB LAW OFFICES  
711 Sir Francis Drake Boulevard  
San Anselmo, CA 9490-1949

Gerald Armstrong  
The Gerald Armstrong Corporation  
711 Sir Francis Drake Boulevard  
San Anselmo, CA 9490-1949

The undersigned declares under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 6, 1992 at Pleasanton, California.

  
\_\_\_\_\_  
NORMA H. MACNAB